

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW HAMPSHIRE**

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In Re: Brian Goodman, Sr.

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Case No.: 25-10233-*KB
Chapter 13

Debtor

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US Bank Trust, NA

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Movant

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Hearing Date: 8/13/2025
Hearing Time: 10:00 A.M.

v.

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*

Brian Goodman, Sr.

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Respondent

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DEBTOR'S ANSWER AND OBJECTION

TO

MOVANT'S MOTION FOR RELIEF FROM AUTOMATIC STAY

NOW COMES the Debtor and Respondent in the above-captioned matter, Brian Goodman, Sr., by and through his Attorneys, Raymond J. DiLucci, P.A. and Answers and Objects to Movant's Motion for Relief from Automatic Stay and in support thereof says:

1. That the Respondent admits the allegations contained in paragraph 1.
2. That the Respondent admits the allegations contained in paragraph 2.
3. That the Respondent admits the allegations contained in paragraph 3.
4. That the Respondent admits the allegations contained in paragraph 4.
5. That the Respondent admits the allegations contained in paragraph 5.
6. That the Respondent admits the allegations contained in paragraph 6.
7. That the Respondent admits the allegations contained in paragraph 7.
8. That the Respondent admits the allegations contained in paragraph 8.
9. That the Respondent admits the allegations contained in paragraph 9.
10. That the Respondent denies the allegations contained in paragraph 10 and states that he believes

payments were made.

11. That the Respondent admits the allegations contained in paragraph 11.
12. That the Respondent admits the allegations contained in paragraph 12 regarding the fair market value, however, lacks sufficient knowledge to admit or deny the allegations regarding the liquidation value.
13. That the Respondent admits the allegations contained in paragraph 13.
14. That the Respondent lacks sufficient knowledge to admit or deny the allegations contained in paragraph 14.
15. That the Respondent admits the allegations contained in paragraph 15.
16. That the Respondent neither admits nor denies the allegations contained in paragraph 16.
17. That the Respondent admits the allegations contained in paragraph 17.
18. That the Respondent denies the allegations contained in paragraph 18.
19. That the Respondent denies the allegations contained in paragraph 19.

WHEREFORE, the Respondent respectfully request that this Honorable Court:

- A. Deny Movant's Motion for Relief from Automatic Stay; and
- B. For such other and further relief as is deemed fair, just and equitable.

Respectfully submitted,
Brian Goodman, Sr.
By and through his Attorney,

Dated: August 6, 2025

/s/ Kathleen E. McKenzie, Esq.
Kathleen E. McKenzie, Esquire
BNH 07628
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